

From: [John J. McNally](#)
To: [Floyd, Tanya](#); [Montanez, Yeliann](#)
Cc: [Swanson, Courtney](#); [Krull, Joseph](#); [Woodruff, Kevin](#); [Snow, Jim](#); [Armstrong, Gregory](#)
Subject: RE: Montco Research Products Site - EPA Section 104 (e) Information Requests/Response
Date: Friday, February 7, 2020 11:51:57 AM

Yeli/Tanya/all – thank you. I appreciate your consideration concerning this effort. As we discussed, I have been working with Mr. Sunoo concerning the site status and response to the EPA information requests. Mr. Sunoo has been to the facility to ensure that the conditions are secure and I have a proposal for the removal of the containers. We are in the process of compiling information and documents and will provide the response to you within the time frame.

Thank you.

John.

John J. McNally, P.E., Esq.

John J. McNally, P.A.

(305) 666-7936 – Office

(305) 720-7936 – Mobile

john@mcnallylawpa.com

www.mcnallylawpa.com

“Practical legal/technical environmental solutions”

From: Floyd, Tanya [mailto:Floyd.Tanya@epa.gov]
Sent: Tuesday, February 04, 2020 3:02 PM
To: John J. McNally; Montanez, Yeliann
Cc: Swanson, Courtney; Krull, Joseph; Woodruff, Kevin; Snow, Jim; Armstrong, Gregory
Subject: RE: Montco Research Products Site - EPA Section 104 (e) Information Requests/Response
John,

As we discussed this afternoon, the EPA agrees to grant your clients an extension until **Tuesday, February 18, 2020**, to submit a **complete** response to the information request **and** the invitation to conduct a time-critical removal action at the Montco Research Products Site as specified in the EPA's January 6, 2020 General Notice, Demand for Payment, and Request for Information Letter. A complete response to the information request is mandatory pursuant to CERCLA Section 104(e). Please do not hesitate to contact Yeli or myself if you have any questions.

Best regards,

Tanya

Tanya Floyd

Attorney

U.S. Environmental Protection Agency, Region 4

61 Forsyth Street, S.W.

Atlanta, Georgia 30303

Phone: (404) 562-9813

Email: floyd.tanya@epa.gov

From: John J. McNally <john@mcnallylawpa.com>

Sent: Friday, January 31, 2020 5:08 PM

To: Montanez, Yeliann <Montanez.Yeliann@epa.gov>

Cc: Swanson, Courtney <Swanson.Courtney@epa.gov>; Krull, Joseph <krull.joseph@epa.gov>; Woodruff, Kevin <Woodruff.KevinL@epa.gov>; Snow, Jim <Snow.James@epa.gov>; Floyd, Tanya <Floyd.Tanya@epa.gov>

Subject: RE: Montco Research Products Site - EPA Section 104 (e) Information Requests/Response

Yeli/all – I understand that we received the EPA information requests and that they were due recently. I have reviewed them with Mr. Sunoo to obtain as much information as is available concerning Montco as well as his own circumstances. As part of this effort, we have reviewed the requests and have been in contact with the accountant that has performed work for Montco in the past. We are trying to get whatever records, documents and information are available to provide in response. I apologize for the delay and we are trying to complete.

Given the status of the compilation of this information, we are requesting some additional time to complete and provide the information responses to EPA. Can you please let me know if you would consider agreeing to an extension of time until February 15th to transmit the response to EPA. Your attention and cooperation is appreciated in this request.

Thank you.

John.

John J. McNally, P.E., Esq.

John J. McNally, P.A.

(305) 666-7936 – Office

(305) 720-7936 – Mobile

john@mcnallylawpa.com

www.mcnallylawpa.com

“Practical legal/technical environmental solutions”

From: Montanez, Yeliann [<mailto:Montanez.Yeliann@epa.gov>]

Sent: Wednesday, January 29, 2020 3:41 PM

To: John McNally

Cc: Swanson, Courtney; Krull, Joseph; Woodruff, Kevin; Snow, Jim; Floyd, Tanya

Subject: Montco Research Products Site

Importance: High

Mr. McNally:

I am writing in regard to the Montco Research Products Site (Site). Your clients' responses to the Information Request, dated January 6, 2020, were due on January 24, 2020. The EPA has not received your clients' responses. Have your clients deposited their responses in the mail? If so, when?

In addition, please note that your clients' response to the EPA's invitation to conduct a time-critical removal action at the is due **tomorrow, January 30, 2020.**

Should you have any questions and/or concerns regarding this e-mail, please feel free to contact me.

Sincerely,

Yeliann Montañez

Attorney-Advisor

Office of Regional Counsel

U.S. EPA Region 4

61 Forsyth Street S.W.

Atlanta, GA 30303

(404) 562-9522

montanez.yeliann@epa.gov